

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

JOHN M. FIFE, CHICAGO VENTURE
PARTNERS, L.P., ILIAD RESEARCH AND
TRADING, L.P., ST. GEORGE
INVESTMENTS LLC, TONAQUINT, INC.,
AND TYPENEX CO-INVESTMENT, LLC,

Defendants.

Civil Action No. 1:20-cv-05227

Honorable Robert M. Dow, Jr.

JOINT STATUS REPORT

Pursuant to this Court’s Orders dated December 20, 2021 (*see* Dkt. No. 31) and December 23, 2021 (*see* Dkt. No. 34), respectively, Plaintiff United States Securities and Exchange Commission (“SEC”) and Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants,” and together with the SEC, the “Parties”) respectfully submit this Joint Status Report. The Parties state as follows:

A. Proposed Discovery Plan:

1. Proposed Date for Rule 26(a)(1) Disclosures

The parties propose a deadline of March 4, 2022 for the exchange of Rule 26(a)(1) disclosures.

2. Proposed Fact Discovery Schedule

The parties propose that fact discovery be permitted to commence on March 7, 2022, and that fact discovery be completed on or before December 16, 2022.

3. Proposed Expert Discovery Schedule

The parties propose the following schedule for expert discovery: (i) expert disclosures under Fed. R. Civ. P. 26(a)(2), including expert reports, to be provided on or before January 13, 2023; (ii) rebuttal expert disclosures, including rebuttal expert reports, to be provided on or before March 13, 2023; (iii) expert depositions to occur on or before May 12, 2023.

B. Statement Regarding Settlement Discussions:

Prior to the filing of this case, the Parties engaged in settlement discussions which did not result in a settlement. In recent weeks, the Parties have resumed settlement discussions, but those recent discussions have not resulted in a settlement. The Parties intend to continue settlement discussions as this case moves forward. The Parties do not request a referral to the assigned Magistrate Judge for a settlement conference at this time.

Dated: January 20, 2022

Respectfully submitted,

/s/ Eric M. Phillips

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on January 20, 2022, he caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the Court's CM/ECF system, which shall send notification of such filing to the following counsel of record:

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